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**Shades of Seattle
Mill Creek Site
Trip Report
Mill Creek, Washington**

TDD: 99-09-0007

Contract: 68-W6-0008
August 2000

Region 10
START

Superfund Technical Assessment and Response Team

Submitted to: Jeff Rodin, On-Scene Coordinator
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101



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TRIP REPORT

DATE: August 31, 2000
TO: Jeff Rodin, On-Scene Coordinator, EPA, Seattle, WA
FROM: David Byers, Project Manager, E & E, Seattle, WA
SUBJ: Shades of Seattle Paint Company, Mill Creek Site, Trip Report
REF: Contract No.: 68-W6-0008
TDD No.: 99-09-0007

Place Visited:

17818 Highway 527 (Bothell-Everett Highway; Latitude 47° 50' 9.37" North, Longitude 122° 12' 39.6" West), Mill Creek, King County, Washington.

Purpose of Trip:

Investigate the report of abandoned paint-related wastes located by a self-serve car wash facility near Mill Creek, Washington. The investigation consisted of evaluating and recording conditions at the site through photographic documentation, sample collection, and hazard categorization. After evaluating and recording conditions at the site, the Superfund Technical Assessment and Response Team (START) was tasked to provide for minor containment, transportation, and disposal of the paint-related wastes.

Persons Responding:

David Byers - Project Manager
Alan Jensen - Site Safety Officer
Ecology & Environment, Inc.
Seattle, Washington

Jason Potts
Glen Thurnstrom
Mark Gregory
Foss Environmental
Seattle, Washington

Mike Szerlog - On-Scene Coordinator
United States Environmental Protection
Agency
Seattle, Washington

Date(s) of Trip:

September 10, 1999

BACKGROUND

In September 1999, the Region 10 United States Environmental Protection Agency (EPA), tasked Ecology & Environment, Inc. (E & E) under the START contract (68-W6-0008) Technical Direction Document (TDD) Number 99-09-0007 to conduct a removal assessment and provide minor containment of abandoned containers of potentially hazardous materials at the Shades of Seattle, Mill Creek site located near Mill Creek, Washington. The EPA On-Scene Coordinator (OSC) notified the START that an unknown person (or persons) had dumped approximately fifty 5-gallon containers of paint-related waste down a hill west of a self-service car wash facility located at 17818 Bothell-Everett Highway. The car wash facility manager found the containers and staged them at the south end of his property.

START ACTIONS

Two START members arrived at the scene at 1700 hours on September 10, 1999. Prior to the START arriving at the site, the containers were staged at the south end of the car wash facility by the manager of the facility. The containers found at the site included fifty-three 5-gallon metal cans, five 2.5-gallon plastic containers, and two 5-gallon plastic buckets. It appeared from initial observations that most of the containers had liquid contents and an intact lid, except the two 5-gallon plastic buckets. A number of abandonments of paint-related wastes have occurred in other parts of Seattle and Washington State. The paint-related wastes were generally Rodda-brand products with strips of masking tape covering the containers. The START confirmed that many of the 5-gallon containers at the Mill Creek site were labeled Rodda-brand lacquer thinner and most of the containers had strips of masking tape around their circumference (See Photos 5 through 11 in Attachment A). The OSC tasked the START to thoroughly document the site through photographs, assess the potential for release of waste to the environment, secure the containers, and arrange for proper disposal of the containers' contents. Photographs of the response activities are provided in Attachment A.

After conducting a health and safety meeting, the START inventoried, marked, and recorded the condition of the containers on site. Based on the inventory of the containers, the START estimated that approximately 230 gallons of paint-related waste was at the site. An inventory of the containers recovered at the site is provided Attached B.

After documenting the condition of the site, 10 containers were randomly selected for the START to sample for Pensky-Martens flashpoint analysis. Nine of the ten containers sampled by the START were 5-gallon metal containers each filled with a colored liquid. The START also sampled a 2.5-gallon plastic container which also was full of a colored liquid. The samples were then placed on ice

until Pensky-Martens flashpoint analysis could be performed on them. On September 14, 1999, the START tested the 10 samples collected at the site for flashpoint per ASTM Standard Method D-93. The results of these tests are provided in Attachment C. The results of the 10 samples indicated that the containers abandoned at the Mill Creek site contained characteristic ignitability criteria hazardous waste as determined by their flashpoints being less than 140 degrees Fahrenheit [40 CFR 261.21 (a)(1)].

At 1900 hours on September 10, 1999, Foss Environmental, subcontracted by the START, arrived on site and began preparing to transport the paint-related waste off site for proper disposal. Foss Environmental began transferring the contents of containers into a 55-gallon poly drum while the START monitored the air for volatile organic compounds (VOCs). After partially filling the poly drum with paint-related waste, the START noticed that the secondary containment also was filling with the waste indicating there was a hole in the drum. Foss Environmental placed the leaking drum into an 85-gallon overpack drum and resumed transferring the waste into the drum. A 55-gallon steel bung-top drum also was filled with paint-related waste. Containers that could not be legally transported because of their physical condition were overpacked into three 85-gallon overpacks and two 55-gallon ring-top drums. Investigation derived waste was bagged and placed into a 55-gallon drum. Empty containers also were transported off site and would be profiled as liquid waste since they contained residue.

While Foss Environmental was preparing to transport the paint-related waste off site, the START performed air monitoring using a Foxboro Instruments TVA 1000 combination flame-ionization/photo-ionization detector in the area where the containers were originally abandoned. Readings elevated above background were detected indicating that some of the solvent had been released to the environment. While investigating the original dump site, the START found an additional container and recovered it.

By 0030 hours on September 11, 1999, all of the containers abandoned at the Mill Creek site and the investigation derived waste had been drummed and transported off site. The hazardous waste manifest for the materials transported off site is provided as Attachment D.

CONCLUSIONS:

On September 10, 1999, the START responded to a report of abandoned containers located at a self-service car wash facility near Mill Creek, Washington. The START recovered, inventoried, and arranged for the off-site transport and disposal of approximately 230 gallons of paint-related waste. Based on air monitoring at the dump site, it would appear that some product may have been released to the environment; however, the released material is not recoverable. A START chemist performed Pensky-Martens Closed Cup flashpoint analysis on samples from 10 of the containers and determined

that all of the samples exhibited flammable characteristics as defined by the Resource Conservation and Recovery Act. All of the containers at the site were transported and disposed of off site by Foss Environmental. No further effort is anticipated under this TDD.

ATTACHMENT A

PHOTOGRAPHIC DOCUMENTATION

PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial #:

TDD #: 99-09-0007

Lens Type: 35 mm

Site Name: Shades of Seattle
Mill Creek Site

Photo	Date	By	Description
1	9/10/99	DB	Self-serve car wash facility overview, facing southwest.
2	9/10/99	DB	Looking west at containers at the staging area.
3	9/10/99	DB	Looking south at the containers in the staging area.
4	9/10/99	DB	Same as Photo 3.
5	9/10/99	DB	View of 5-gallon metal container, note that the label has the name "Rodda" on it and a flammable label.
6	9/10/99	DB	Another view of the 5-gallon metal containers, note the masking tape on the containers.
7	9/10/99	DB	Another view of 5-gallon metal containers and 2.5-gallon plastic containers. Note that the 2.5-gallon container of paint thinner on the right side of photo does not have a lid.
8	9/10/99	DB	Same as Photo 7.
9	9/10/99	DB	More 5-gallon metal and 2.5-gallon plastic containers.
10	9/10/99	DB	Same as Photo 9.
11	9/10/99	DB	Same as Photo 9.
12	9/10/99	DB	Same as Photo 9.
13	9/10/99	DB	Same as Photo 9.
14	9/10/99	DB	Product Sample 1 collected from a 5-gallon metal container labeled "Dirty Laquer."
15	9/10/99	DB	Closer view of Sample 1 shown in Photo 14.
16	9/10/99	DB	Product Sample 2 collected from a 2.5-gallon plastic container labeled "Paint Thinner."
17	9/10/99	DB	Same as Photo 16.
18	9/10/99	DB	Product Sample 3 collected from an unlabeled 5-gallon metal container.
19	9/10/99	DB	Same as Photo 18, note the flammable label.

PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial #:

TDD #: 99-09-0007

Lens Type: 35 mm

Site Name: Shades of Seattle
Mill Creek Site

Photo	Date	By	Description
20	9/10/99	DB	The START conducting air monitoring.
21	9/10/99	DB	The local media preparing to investigate the activities at the site.
22	9/10/99	DB	Product Sample 4 collected from a 5-gallon metal container labeled as containing a flammable liquid.
23	9/10/99	DB	Same as Photo 22.
24	9/10/99	DB	The EPA OSC being interviewed by the local media.
25	9/10/99	DB	Same as Photo 24.
26	9/10/99	DB	Product Sample 5 collected from a 5-gallon metal container labeled as containing a flammable liquid.
27	9/10/99	DB	Same as Photo 26.
28	9/10/99	DB	Product Sample 6 collected from a 5-gallon metal container labeled as containing a flammable liquid.
29	9/10/99	DB	Same as Photo 28.
30	9/10/99	DB	Product Sample 7 collected from a 5-gallon metal container labeled as containing a flammable liquid.
31	9/10/99	DB	Same as Photo 30.
32	9/10/99	DB	Product Sample 8 collected from a 5-gallon metal container labeled as containing a flammable liquid.
33	9/10/99	DB	Same as Photo 32.
34	9/10/99	DB	Product Sample 9 collected from a 5-gallon metal container labeled as containing a flammable liquid.
35	9/10/99	DB	Same as Photo 34.
36	9/10/99	DB	Product Sample 10 collected from a 5-gallon metal container labeled as containing a flammable liquid.

PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial #:

TDD #: 99-09-0007

Lens Type: 35 mm

Site Name: Shades of Seattle
Mill Creek Site

Photo	Date	By	Description
37	9/10/99	DB	Same as Photo 36.
38	9/10/99	DB	Foss Environmental preparing to over-pack paint-related waste into 55-gallon drums.
39	9/10/99	DB	Foss Environmental transferring flammable liquids into larger vessel for disposal.
40	9/10/99	DB	The START monitoring for volatile organic compounds as Foss Environmental transfers flammable liquids into larger vessel.
41	9/10/99	DB	Foss Environmental has upgraded to Level C PPE to complete the transfer of flammable liquids for disposal.
42	9/10/99	DB	Foss Environmental checking the liquid level in the first container.
43	9/10/99	DB	Foss Environmental continuing transfer operations.
44	9/10/99	DB	Same as Photo 43.
45	9/10/99	DB	Same as Photo 43.
46	9/10/99	DB	Same as Photo 43.
47	9/10/99	DB	Same as Photo 43.
48	9/10/99	DB	The START collecting the Global Positioning information from the original dump site.
49	9/10/99	DB	Foss Environmental continuing transfer operations.
50	9/10/99	DB	Same as Photo 49.
51	9/10/99	DB	A 5-gallon metal container with what appears to be white paint covering the top of the can and the word "Dirty" written on the masking tape on the can.
52	9/10/99	DB	A 5-gallon metal can of lacquer thinner manufactured by Rodda with masking tape on the can.

PHOTOGRAPH IDENTIFICATION SHEET

Camera Serial #:

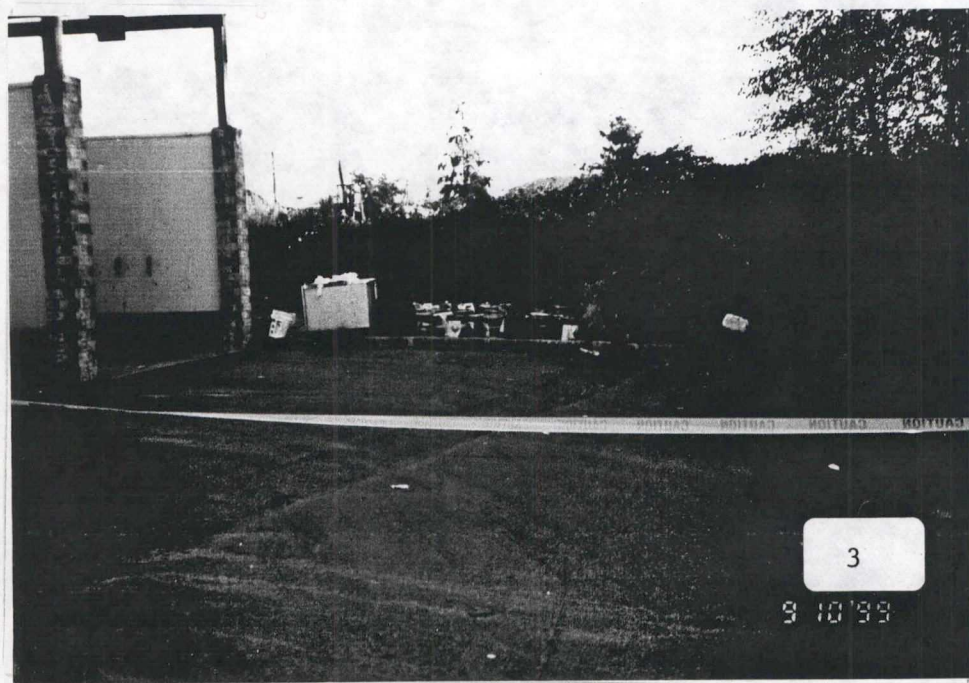
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Lens Type: 35 mm

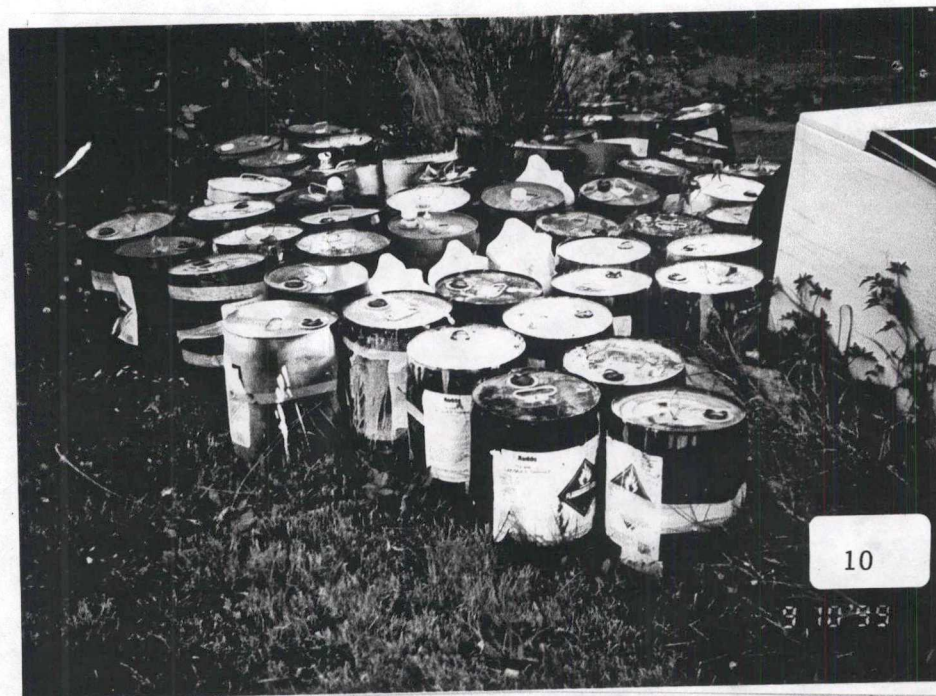
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Mill Creek Site

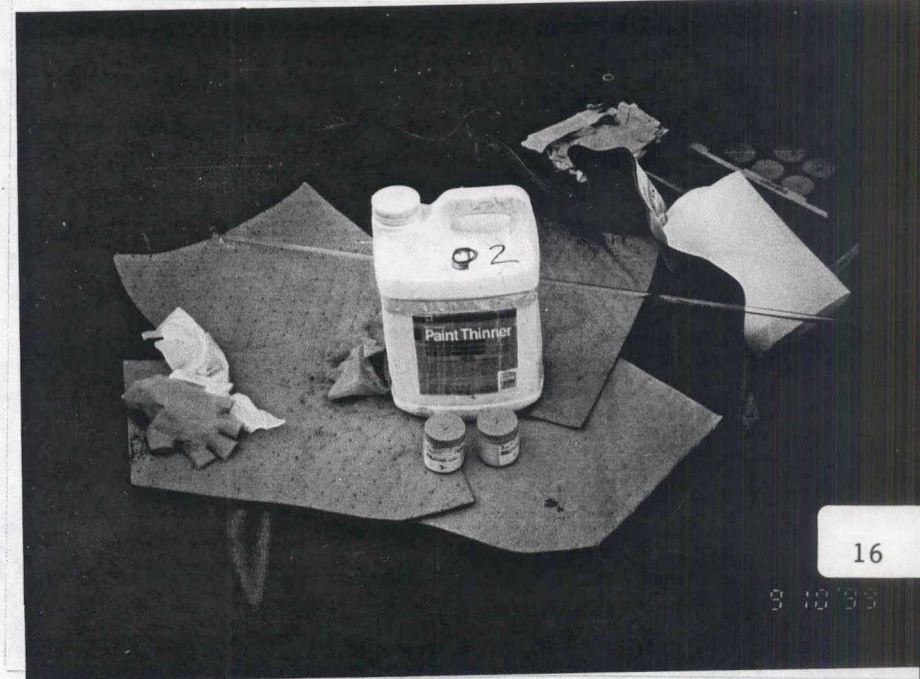
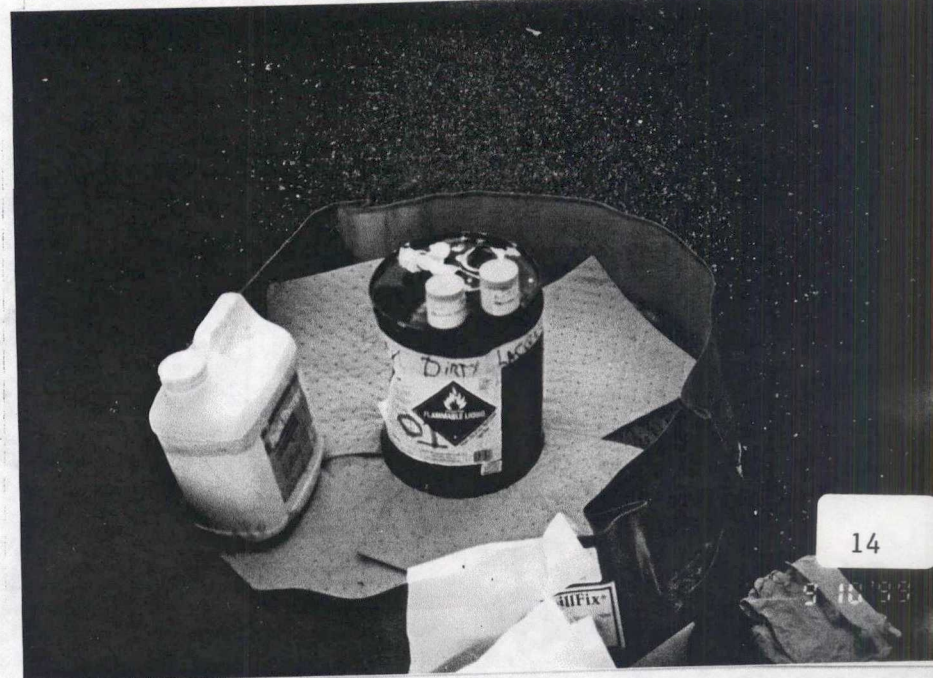
Photo	Date	By	Description
53	9/10/99	DB	Foss Environmental lading up the recently transferred paint-related waste for transport.
54	9/10/99	DB	A storm drain in the parking lot of the self-service car wash facility.
55	9/10/99	DB	The staging area with all of the containers removed.
56	9/10/99	DB	A closer view of the staging area with the containers removed. Note the stained areas on the grass and the strained vegetation.
57	9/10/99	DB	Another view of the staging area with the containers removed.
58	9/10/99	DB	Foss Environmental placarding their truck for transporting flammable liquids.
59	9/10/99	DB	A view of the car wash parking lot after all of the containers and sampling equipment have been removed.
60	9/10/99	DB	Same as Photo 59.
61	9/10/99	DB	Foss Environmental transporting the paint-related waste off site.
62	9/10/99	DB	Overview of the self-service car wash facility at the end of the field event.

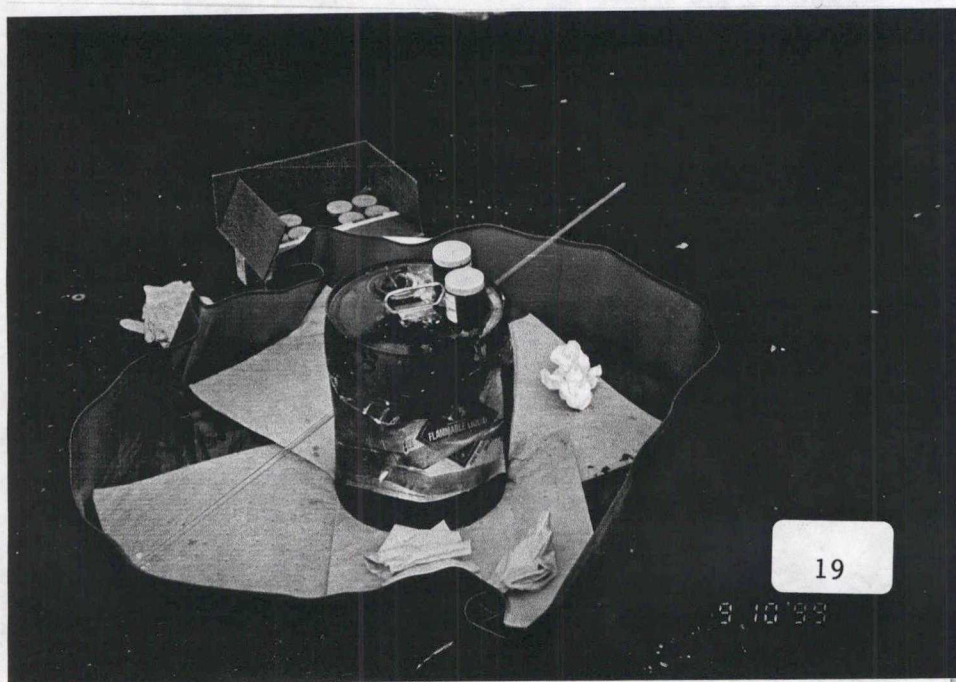
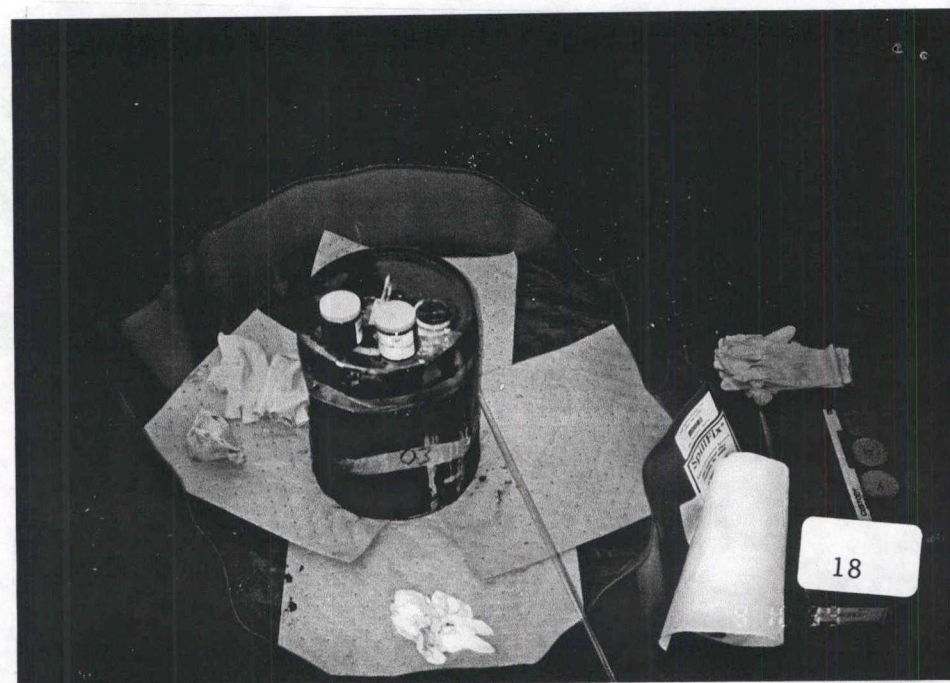
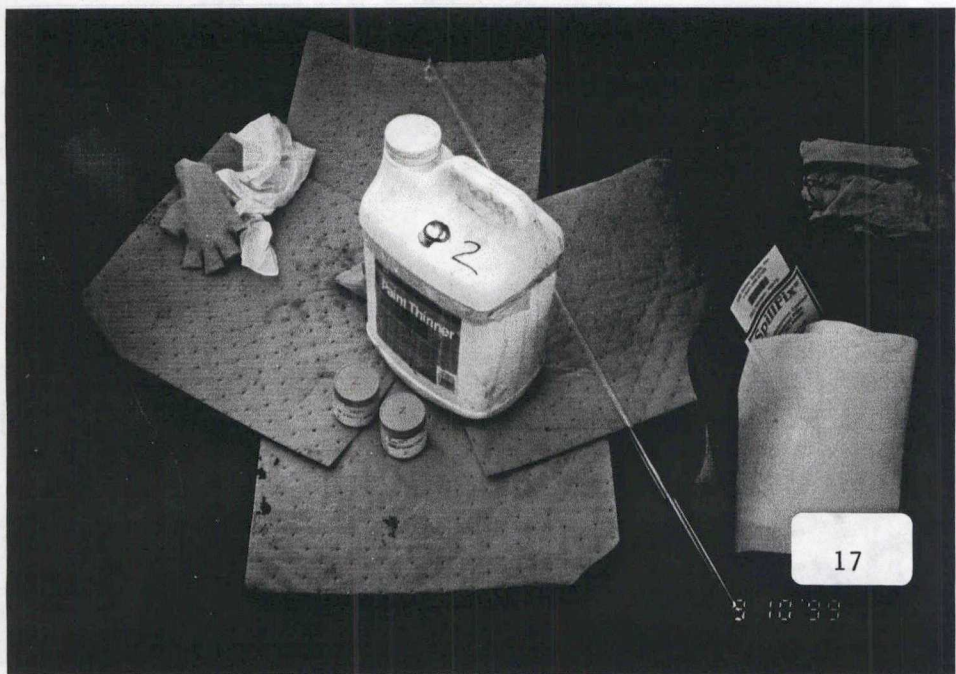
DB — David Byers

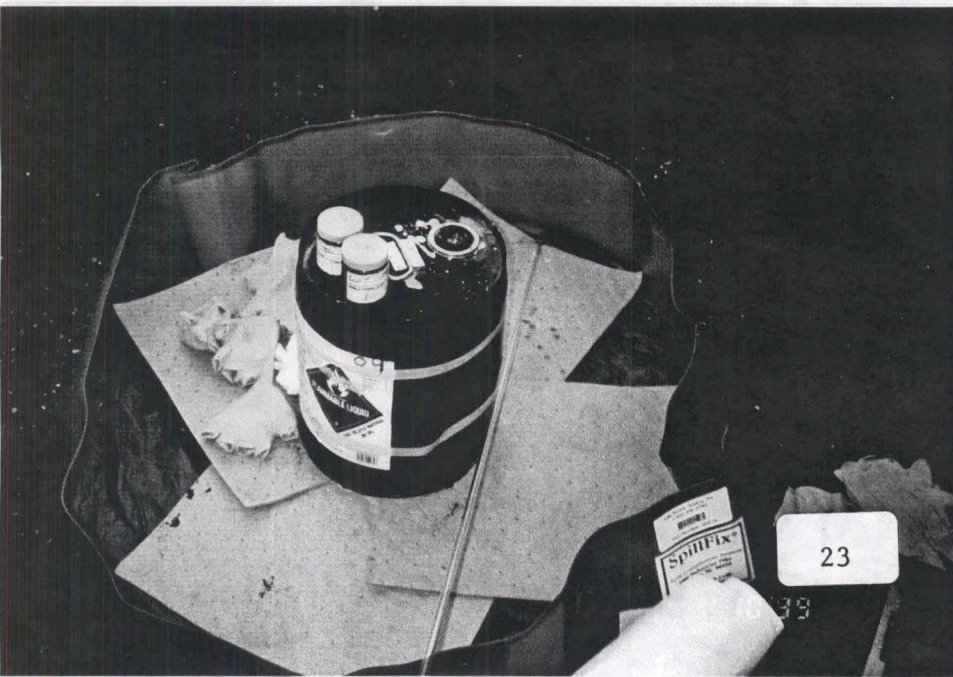
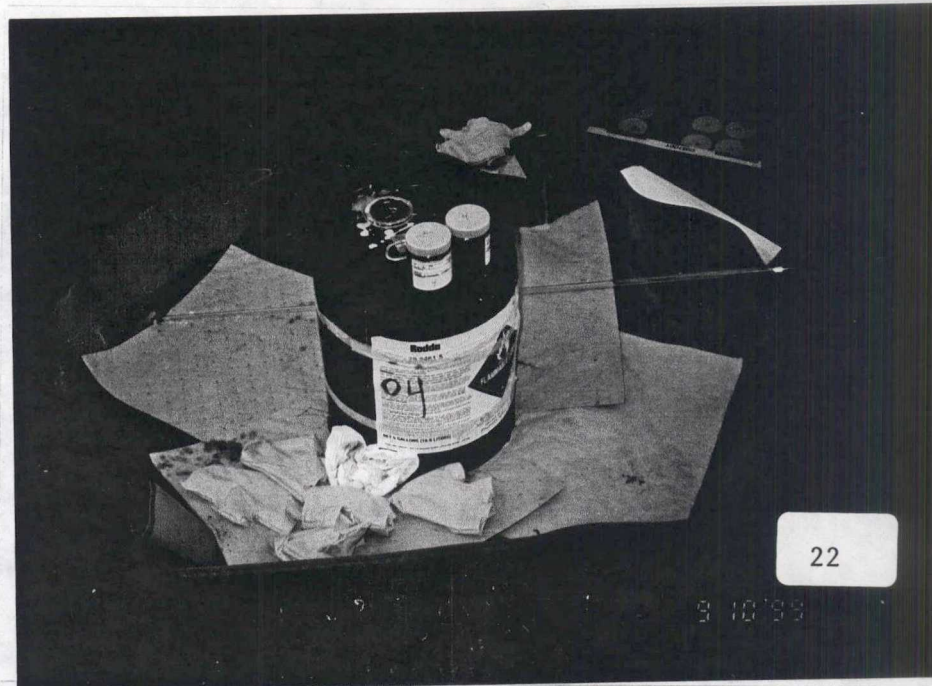
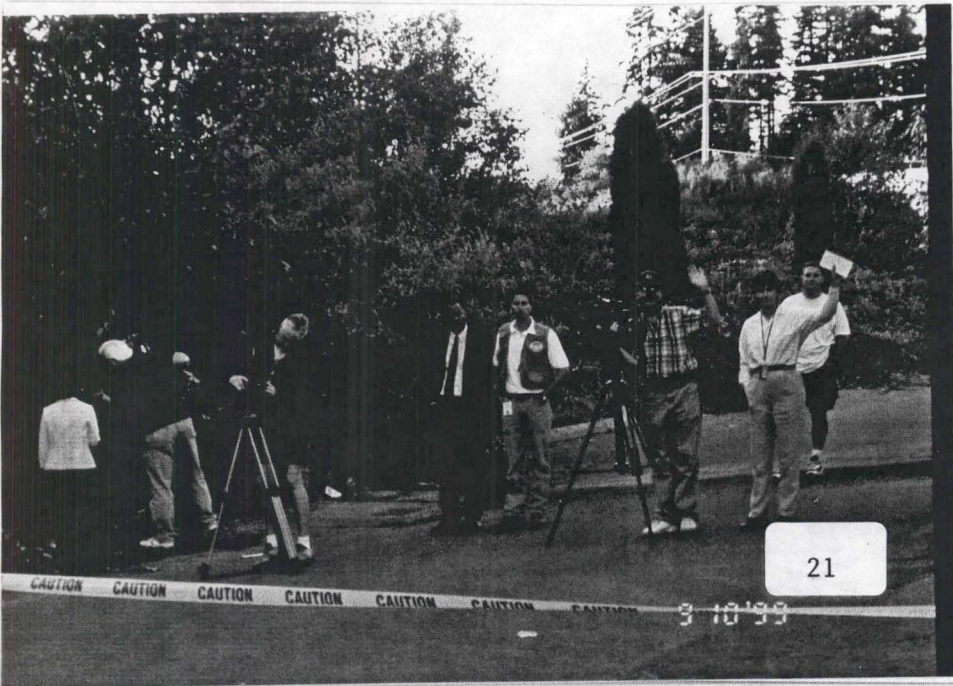


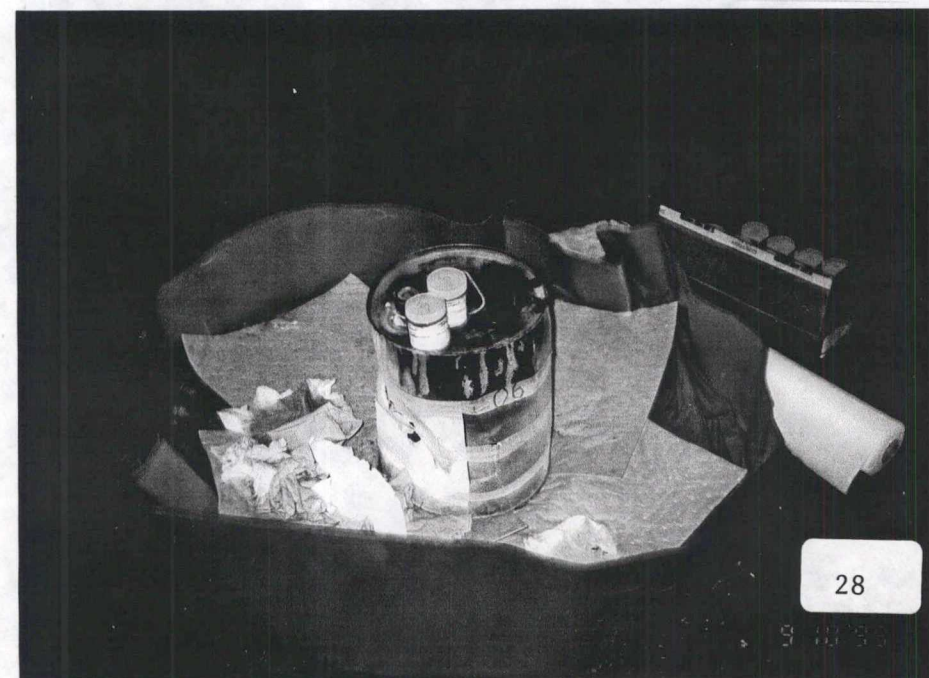
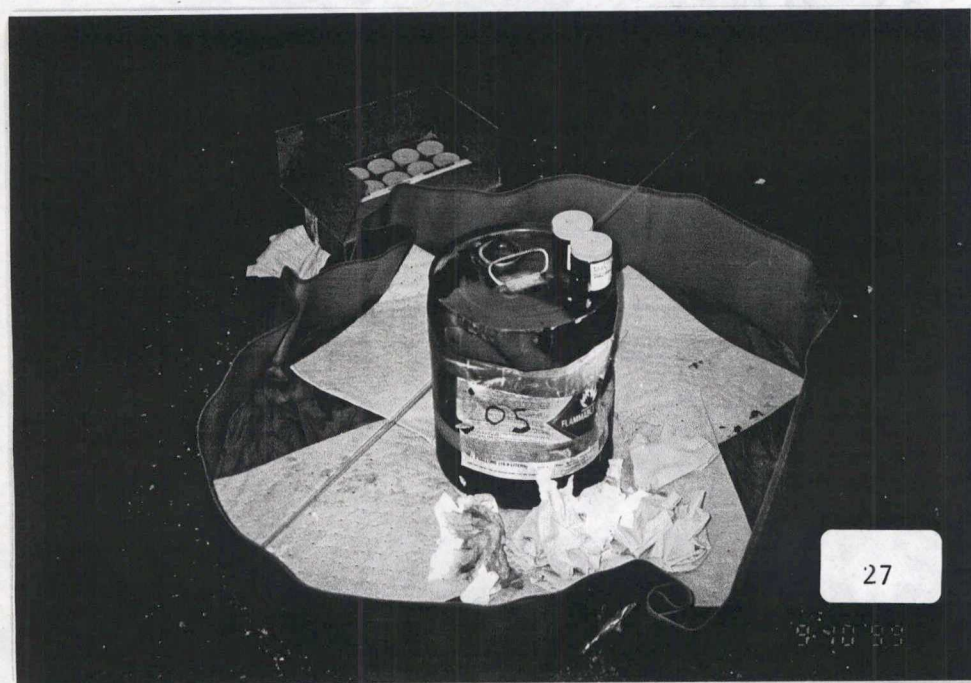
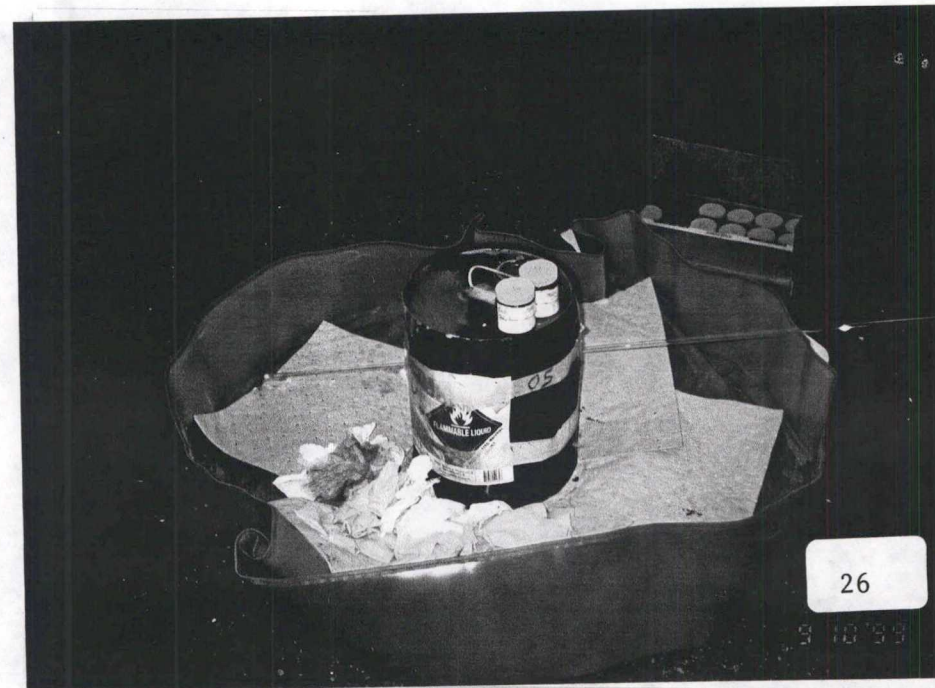
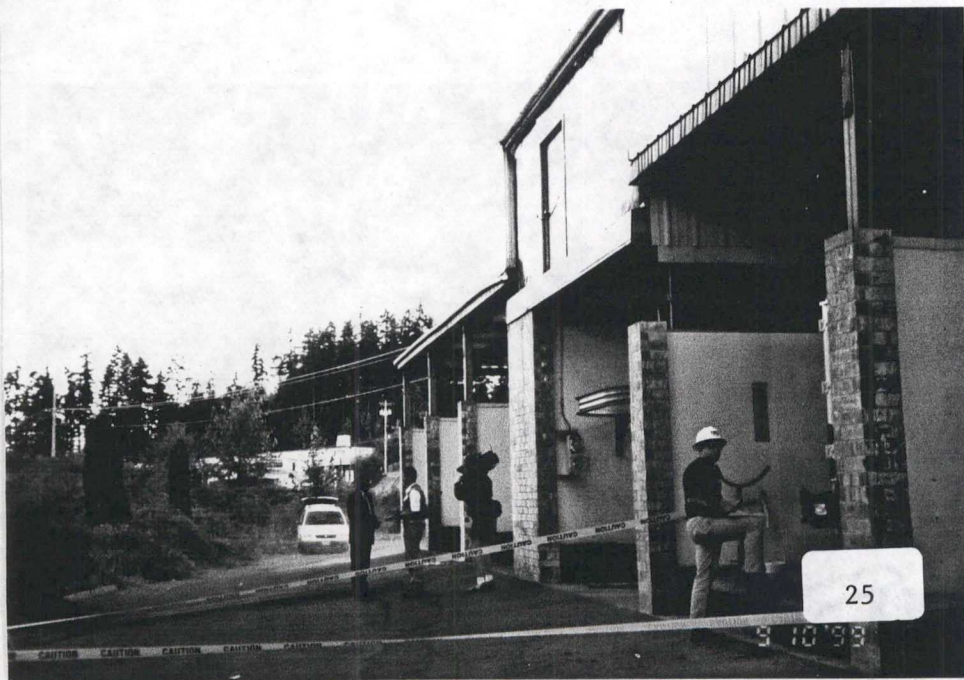


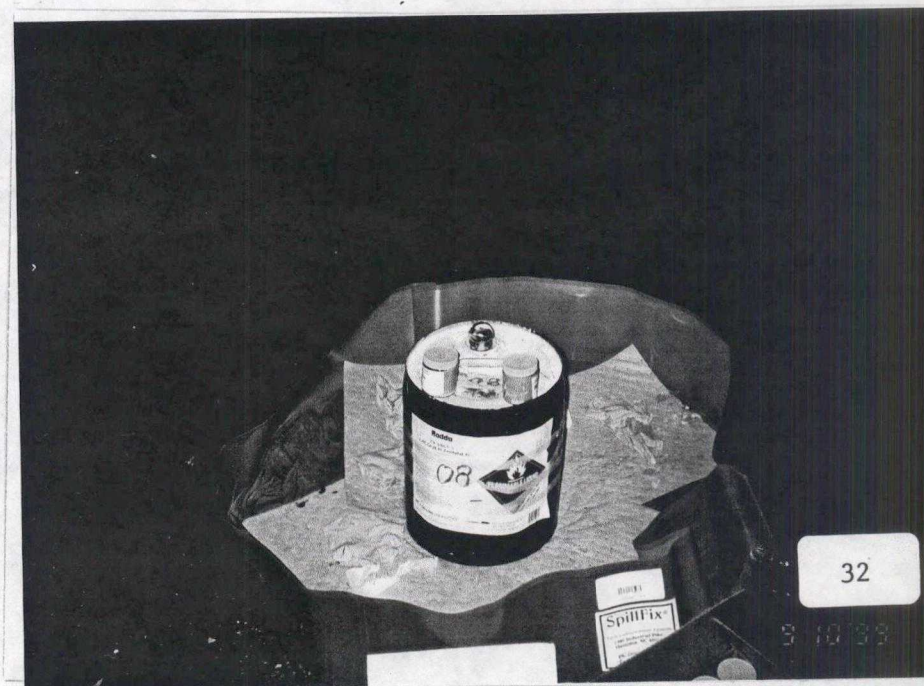
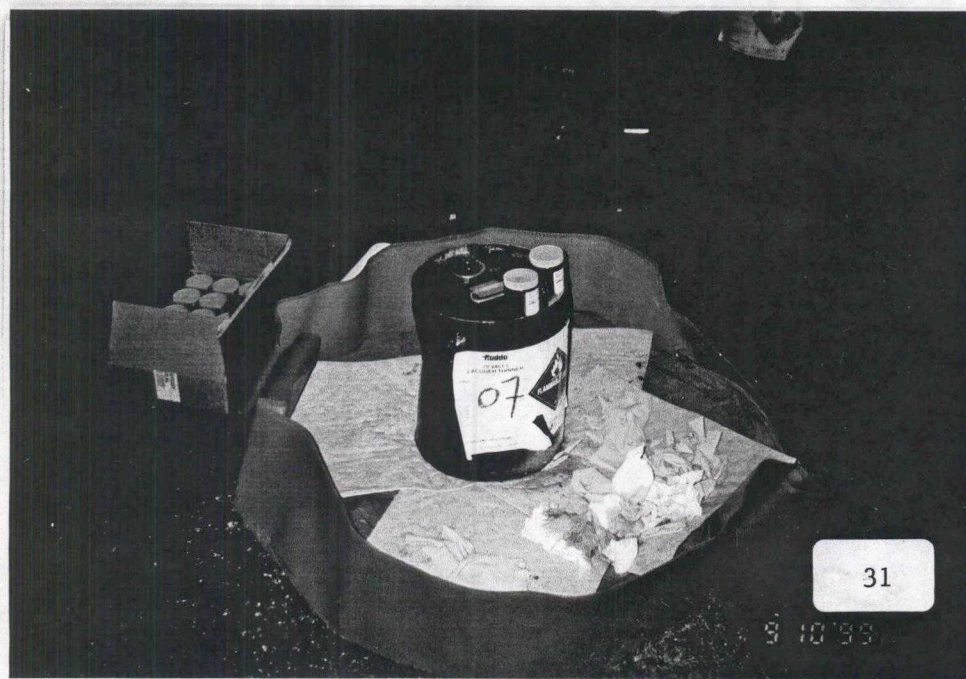
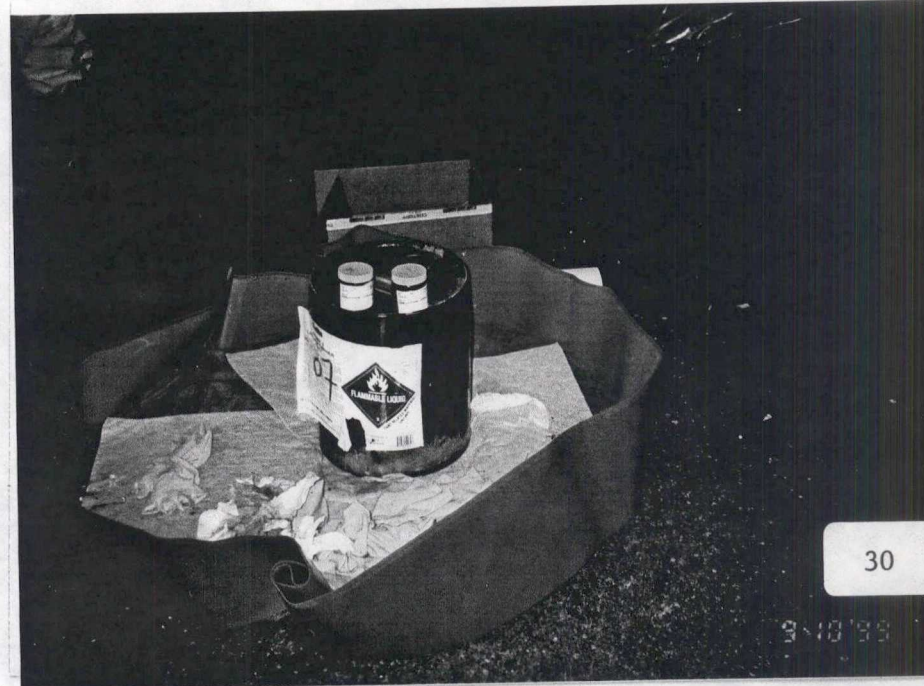


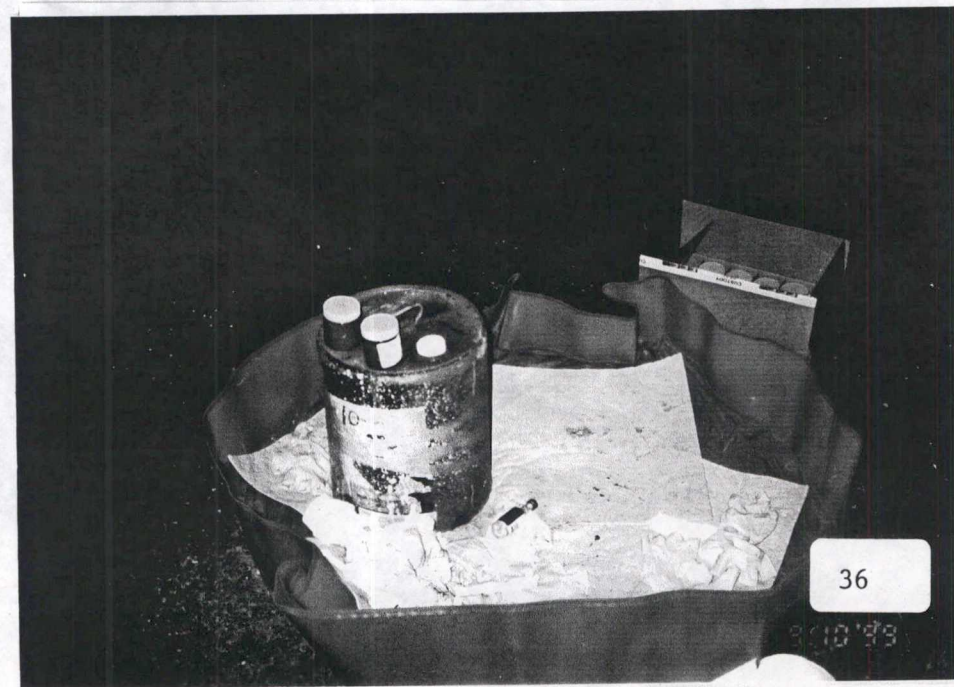
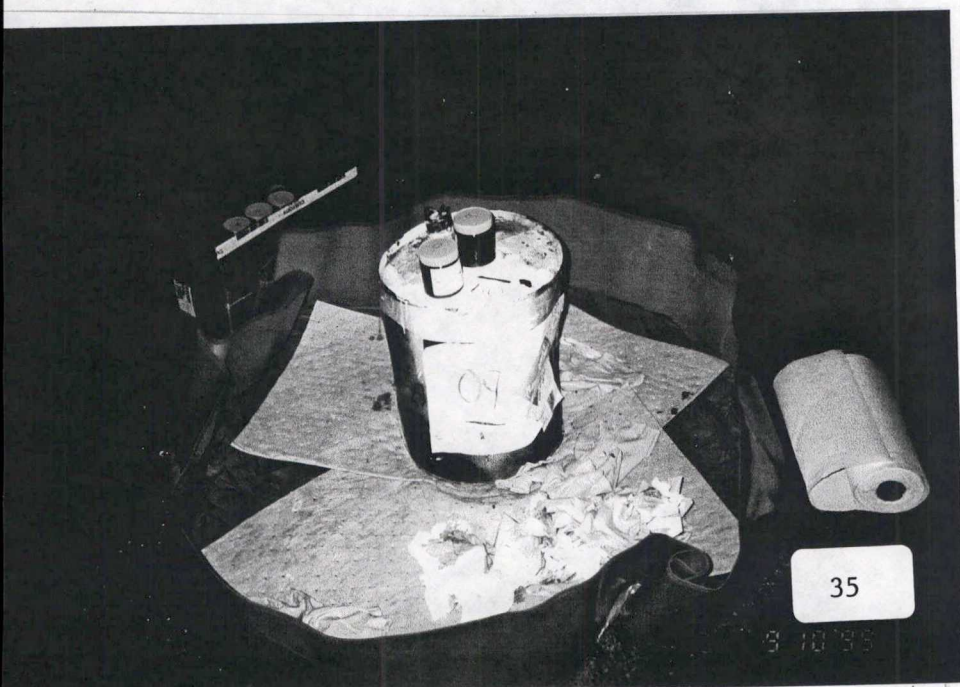
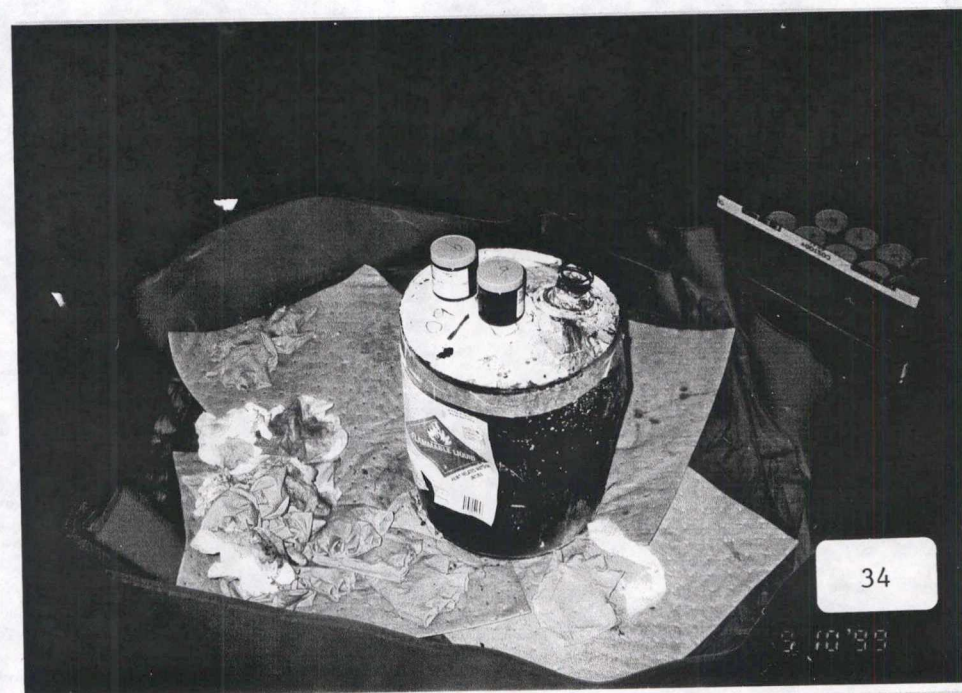
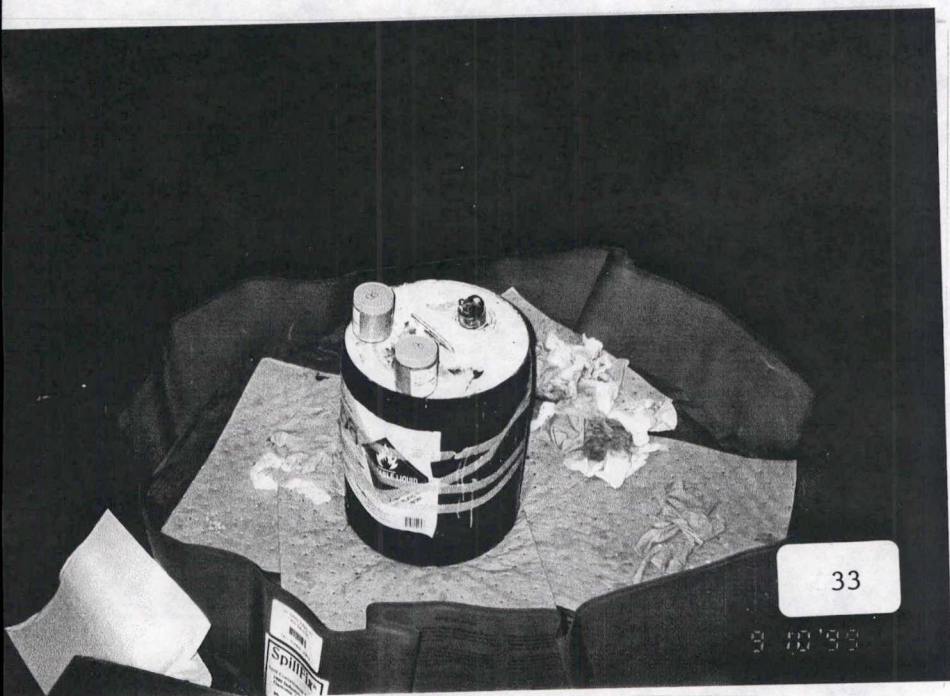


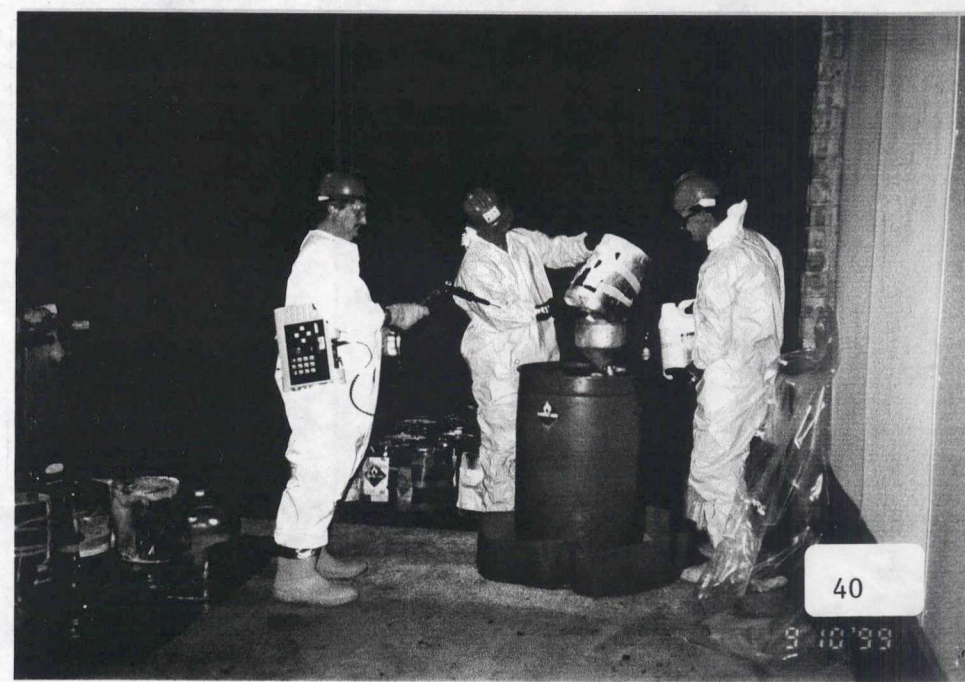
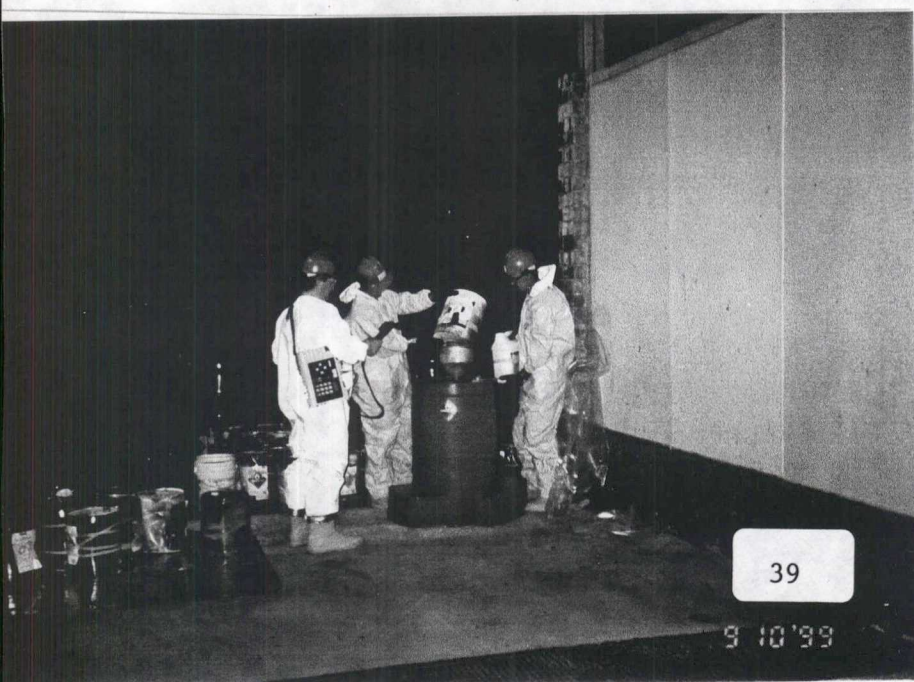
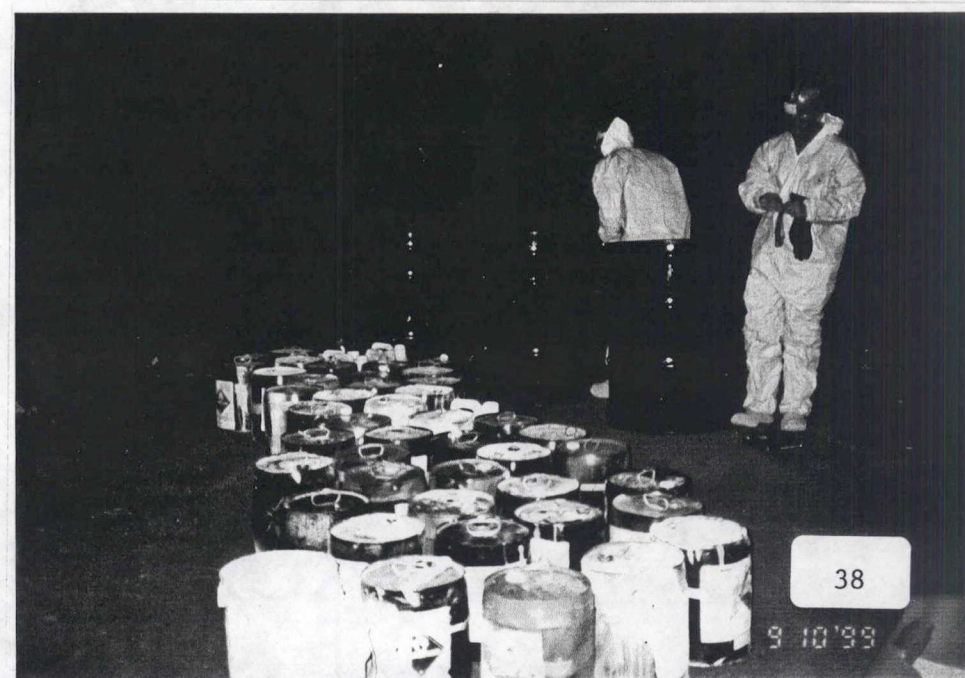
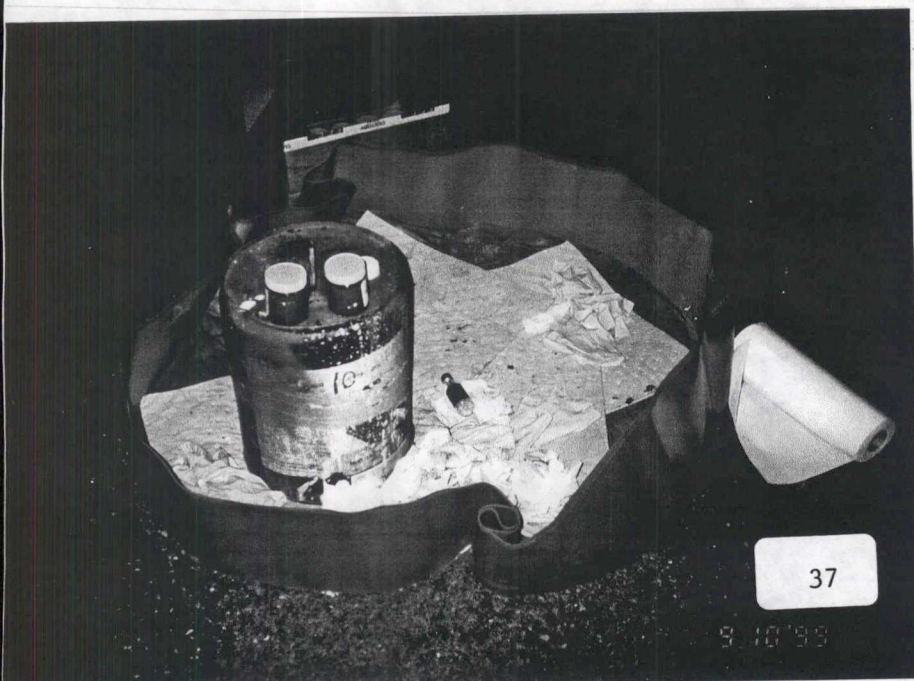


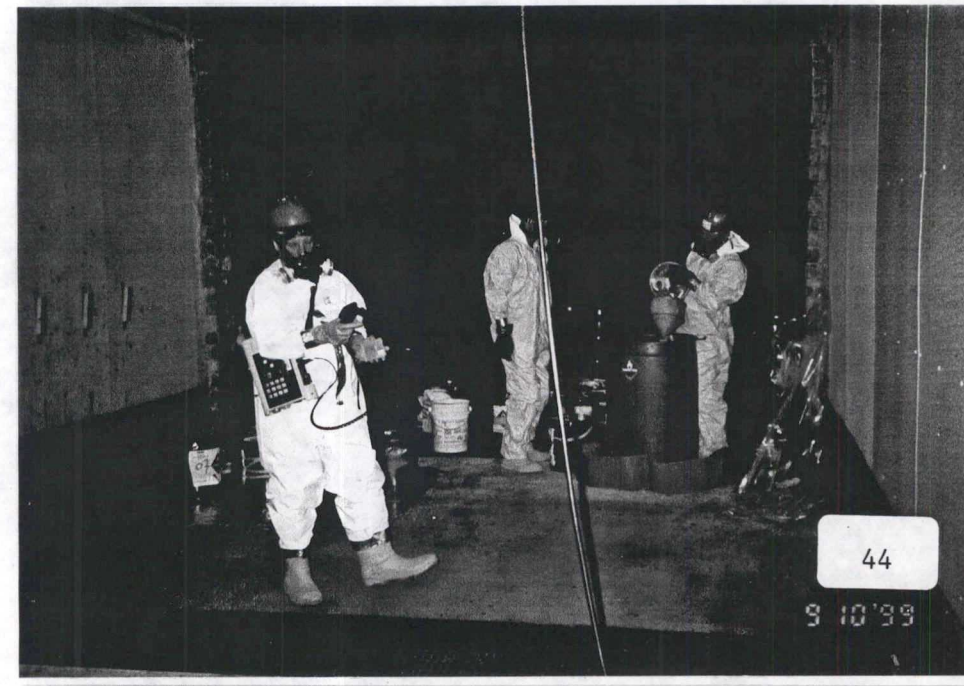
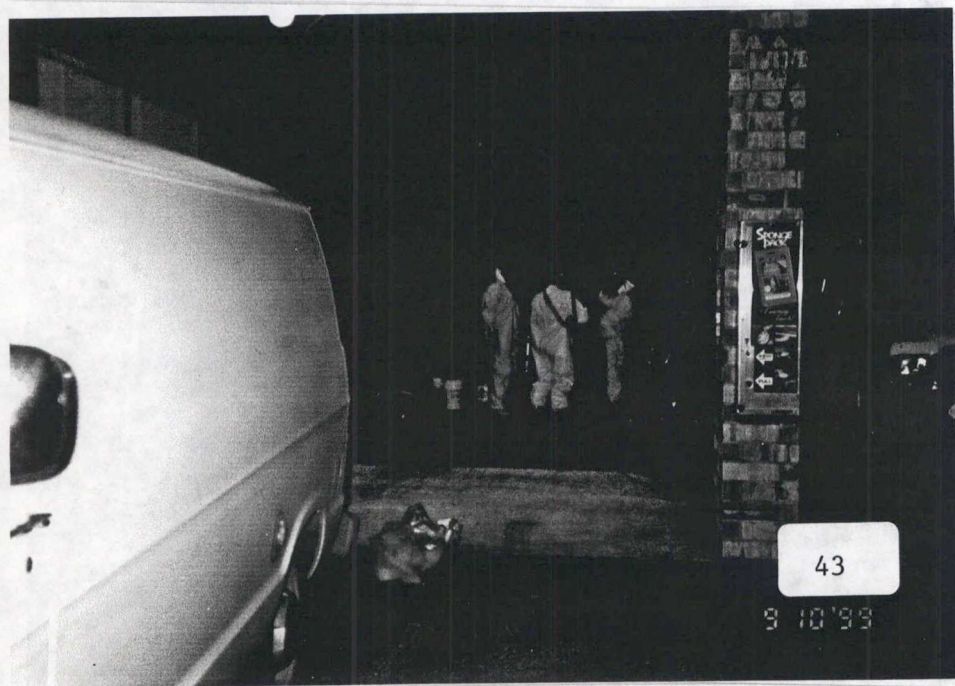
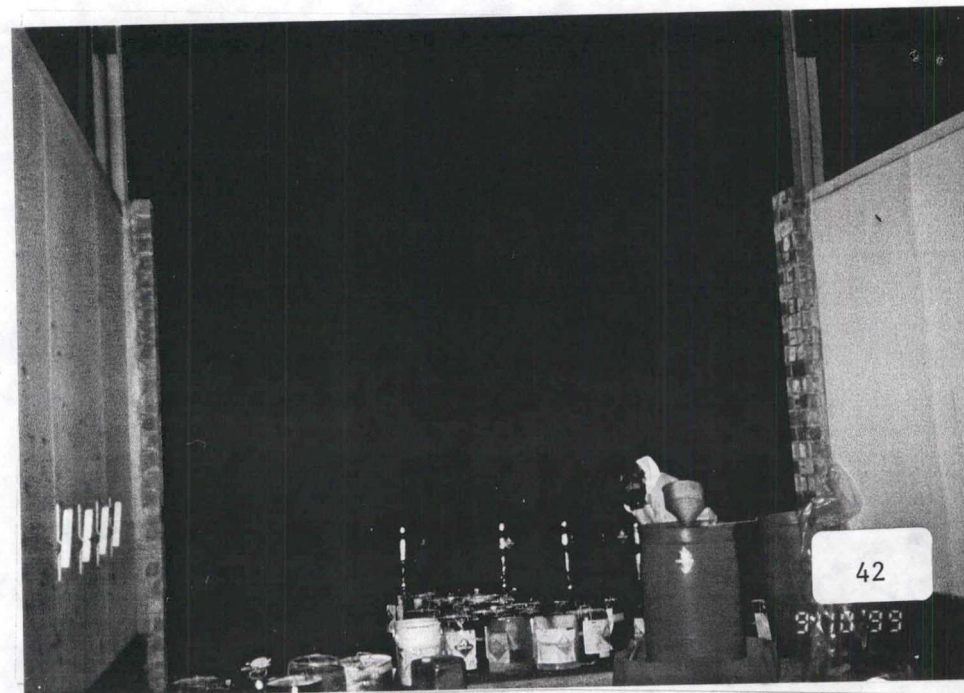


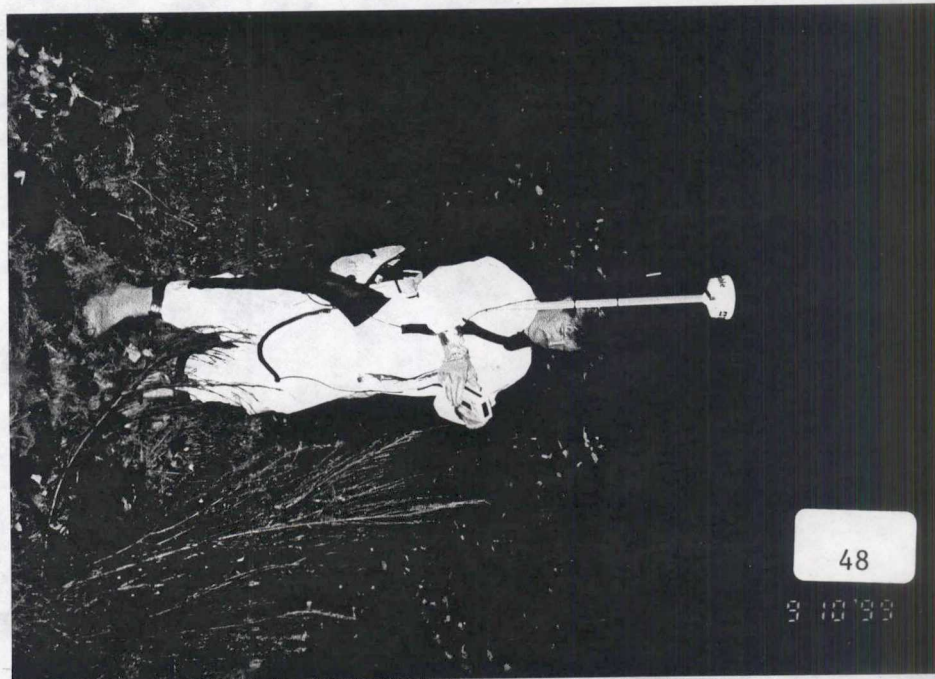
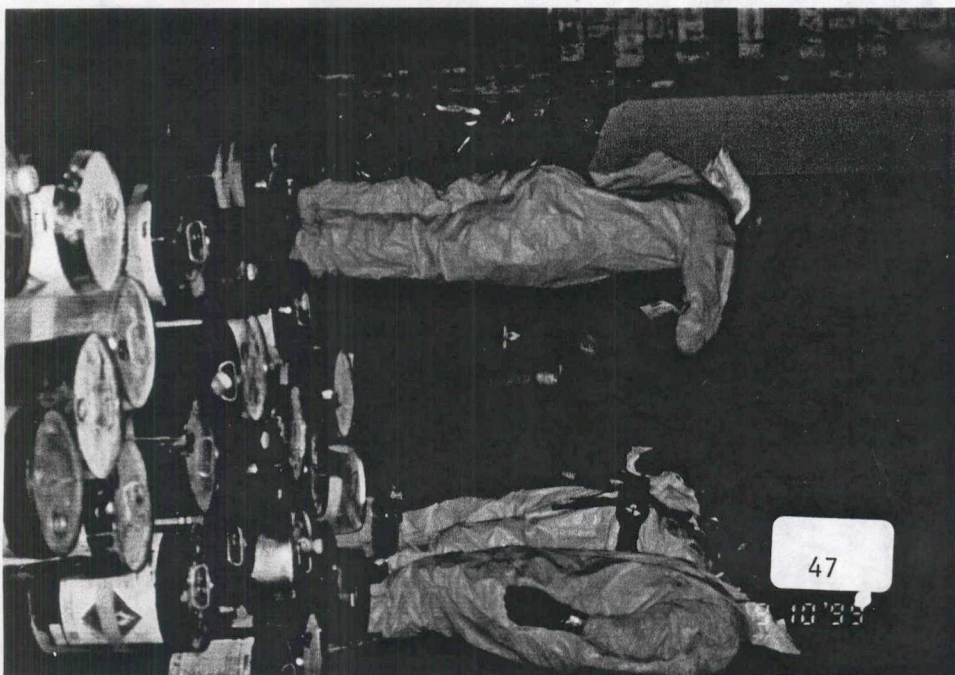
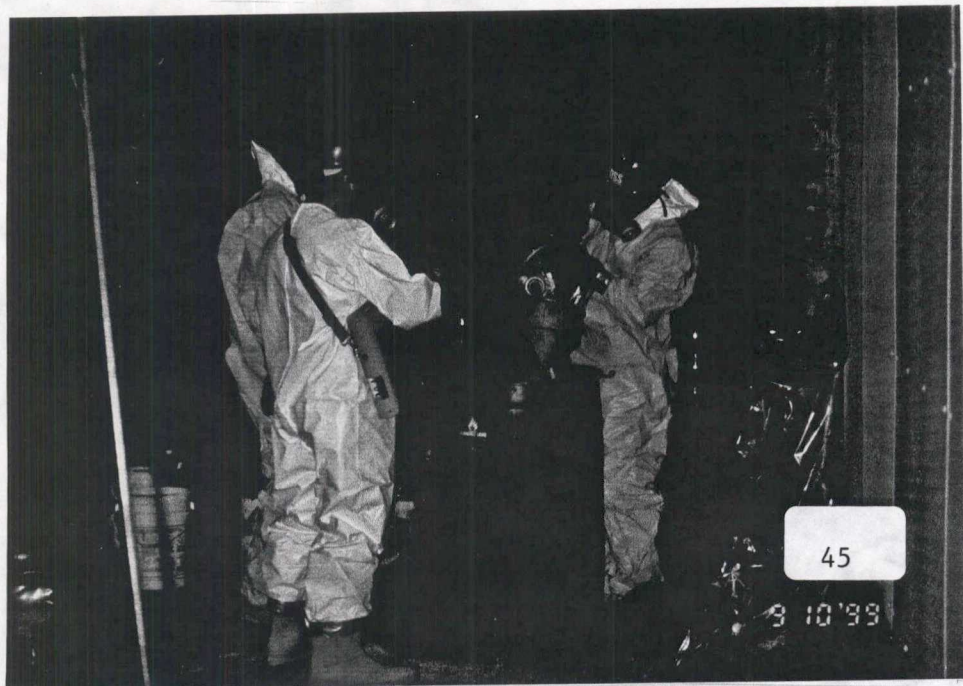


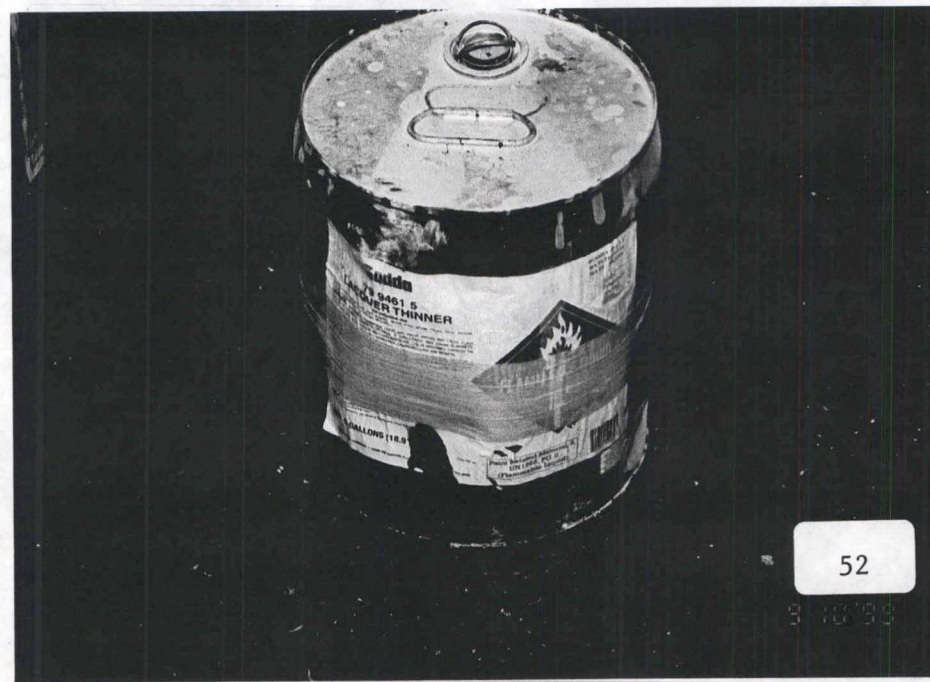
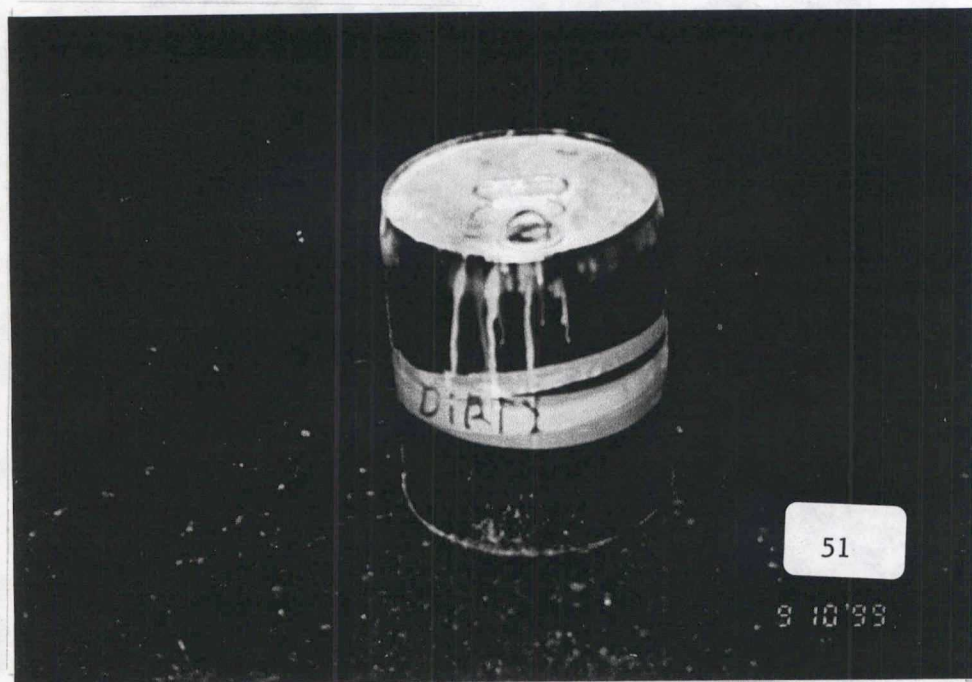
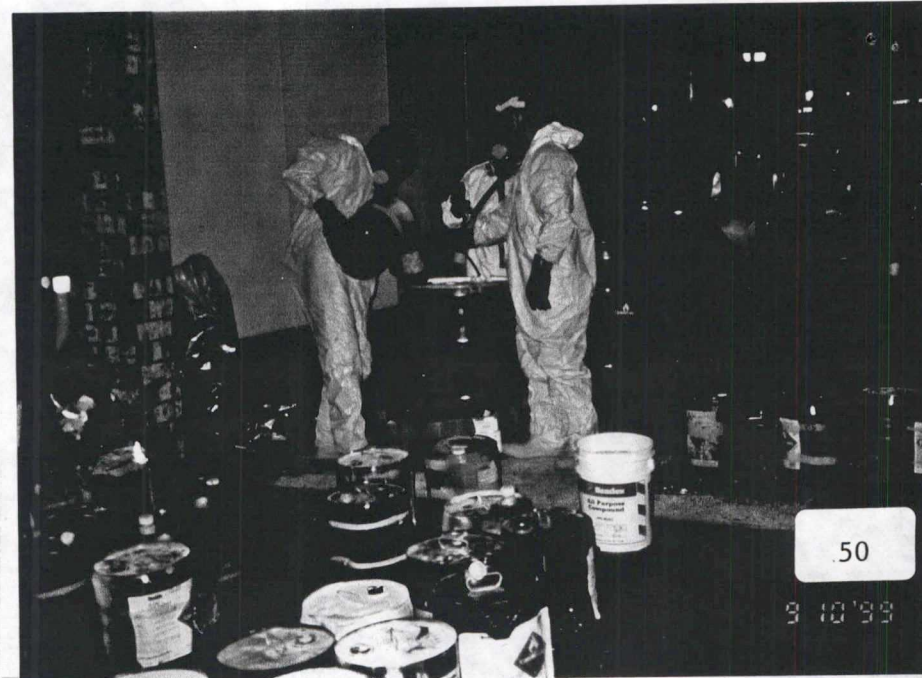




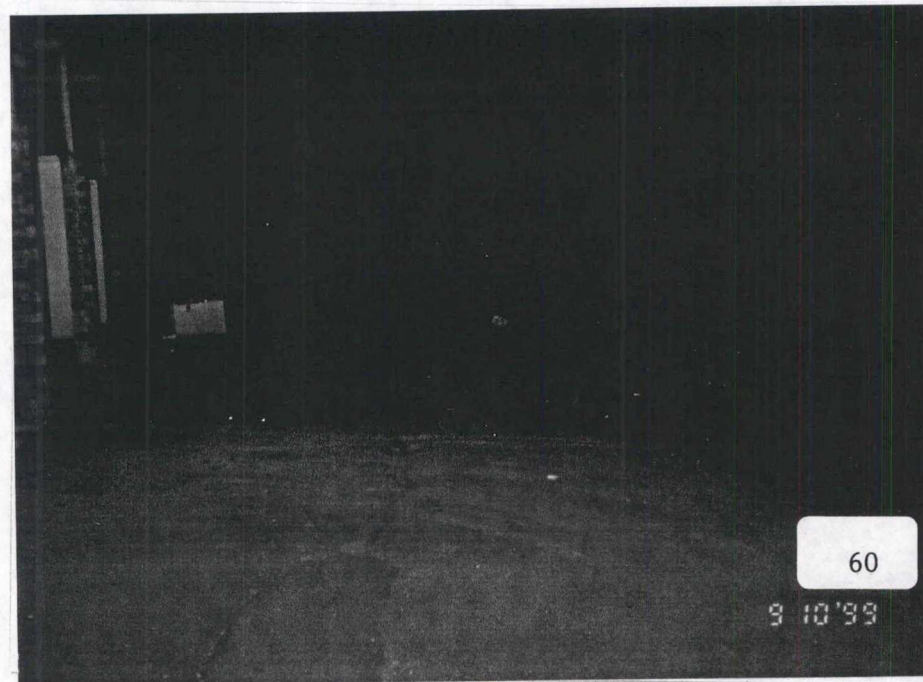
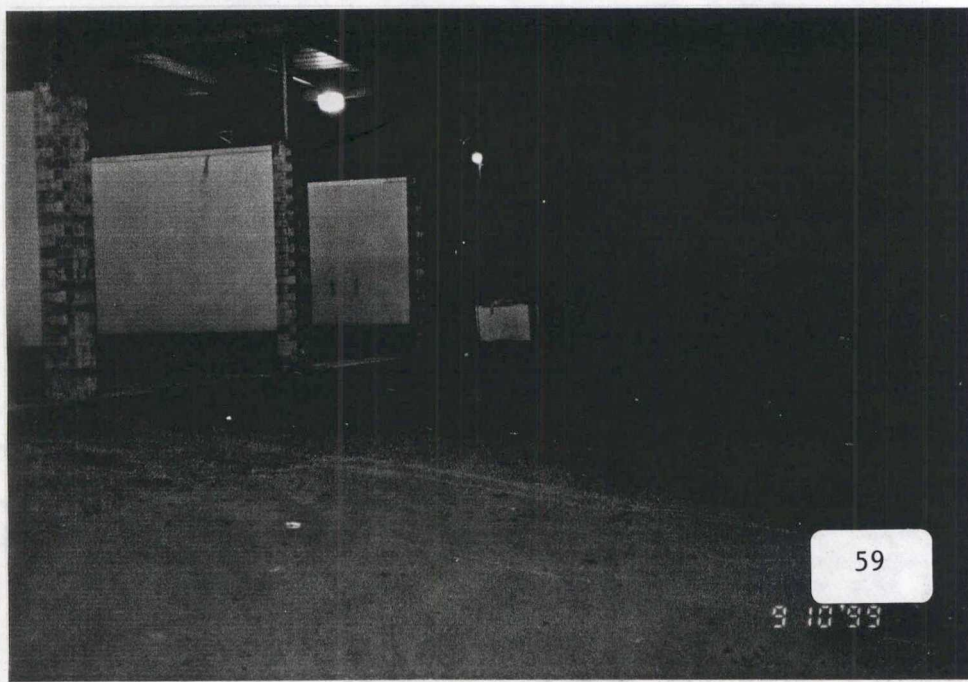
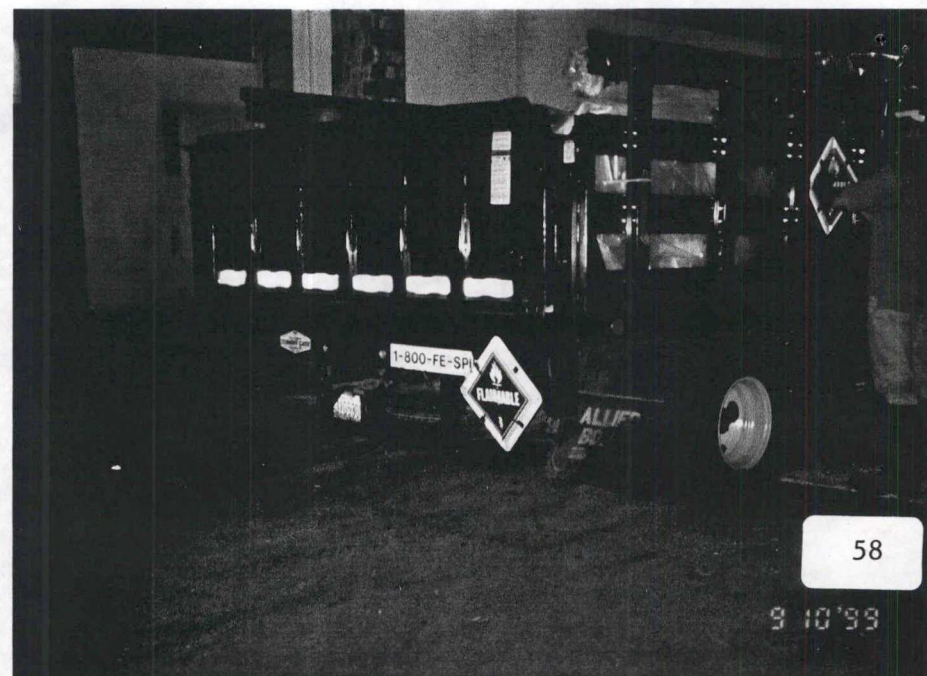
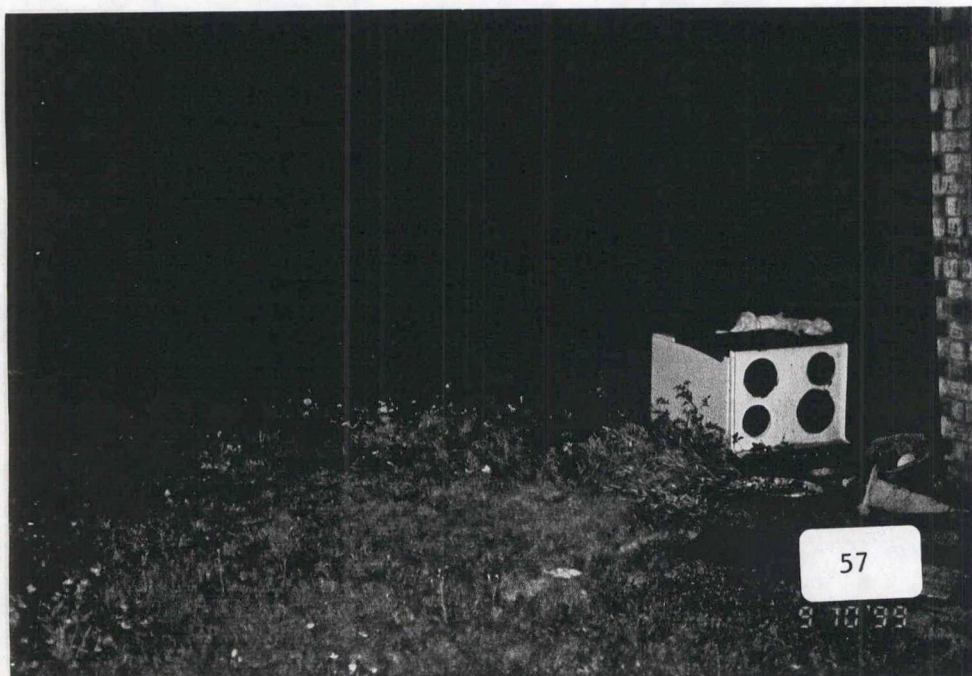


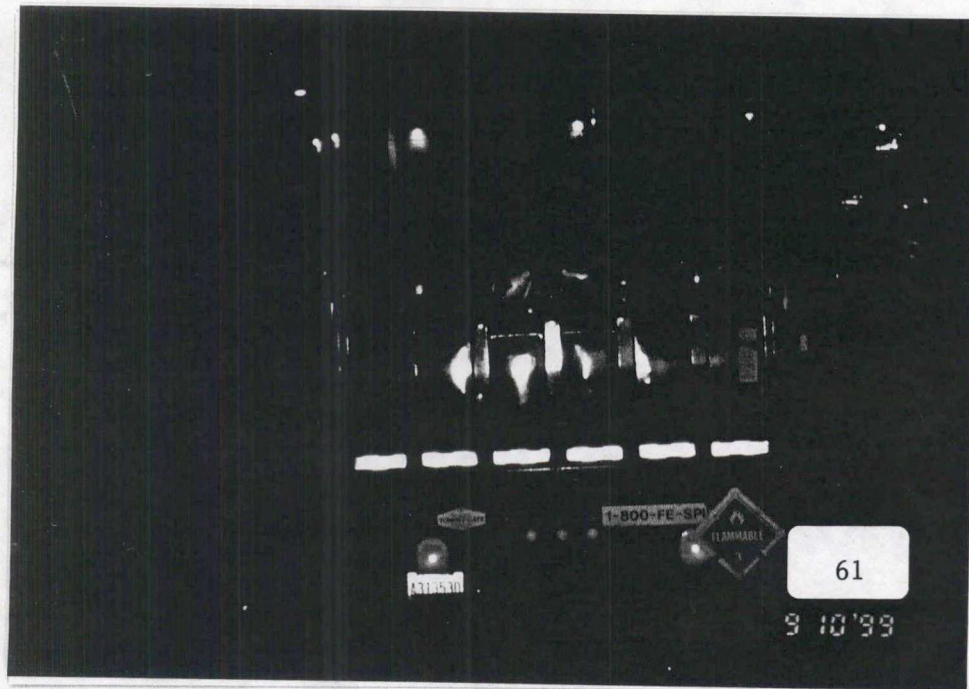






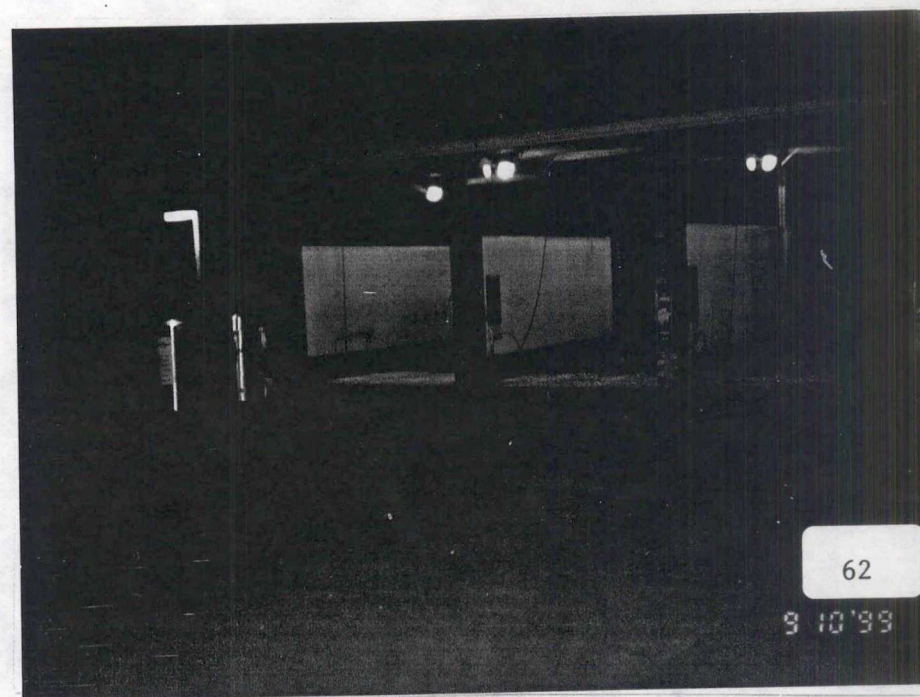






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SEATTLE FILMWORKS

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ATTACHMENT B

CONTAINER INVENTORY

Shades of Seattle - Mill Creek Site
Container Inventory
September 10, 1999

Container Number	Container Size	Estimated Percent Full	Volume (gallons)	Sample Number
1	5	95	4.8	1
2	2.5	90	2.3	2
3	5	95	4.8	3
4	5	95	4.8	4
5	5	100	5.0	5
6	5	95	4.8	6
7	5	95	4.8	7
8	5	95	4.8	8
9	5	90	4.5	9
10	5	90	4.5	10
11	2.5	75	1.9	
12	2.5	50	1.3	
13	2.5	25	0.6	
14	2.5	50	1.3	
15	5	100	5.0	
16	5	25	1.3	
17	5	100	5.0	
18	5	12.5	0.6	
19	5	100	5.0	
20	5	50	2.5	
21	5	100	5.0	
22	5	100	5.0	
23	5	12.5	0.6	
24	5	50	2.5	
25	5	100	5.0	
26	5	100	5.0	
27	5	100	5.0	
28	5	100	5.0	
29	5	100	5.0	
30	5	75	3.8	
31	5	100	5.0	
32	5	75	3.8	
33	5	100	5.0	
34	5	100	5.0	
35	5	100	5.0	
36	5	100	5.0	
37	5	100	5.0	
38	5	100	5.0	
39	5	100	5.0	
40	5	100	5.0	
41	5	25	1.3	
42	5	100	5.0	

Shades of Seattle - Mill Creek Site
Container Inventory
September 10, 1999

Container Number	Container Size	Estimated Percent Full	Volume (gallons)	Sample Number
43	5	100	5.0	
44	5	100	5.0	
45	5	25	1.3	
46	5	50	2.5	
47	5	50	2.5	
48	5	25	1.3	
49	5	50	2.5	
50	5	100	5.0	
51	5	100	5.0	
52	5	100	5.0	
53	5	100	5.0	
54	5	100	5.0	
55	5	100	5.0	
56	5	100	5.0	
57	5	25	1.3	
58	5	75	3.8	
59	5	75	3.8	plastic bucket
60	5	12.5	0.6	plastic bucket
Total Volume			230.4	

ATTACHMENT C

PENSKY-MARTENS FLASHPOINT ANALYSIS MEMORANDUM

MEMORANDUM

Date: October 1, 1999

To: Jeff Rodin, On-Scene Coordinator, U.S. Environmental Protection Agency

From: David Byers, Chemist, CHMM, Ecology and Environment, Inc.

Subj: Pensky-Martens Flash Point Analysis

Ref: TDD: 99-09-0007, Shades of Seattle, Mill Creek Dump Site, Bothell-Everett Hwy.

On September 14, 1999, I performed Pensky-Martens Closed Cup flash point analysis on 10 liquid samples following ASTM method D-93 (96), Procedure A, *manual apparatus*. Descriptions of the samples and their flash points are given below. All samples were collected on September 10, 1999 under the direction of OSC Michael Szerlog.

Sample Number	Sample Description	Flash** Point °F
1	Cloudy white liquid	<58
2	Cloudy white liquid	112
3	Gray cloudy liquid	<62
4	Tan, varnish-like liquid	<60
5	Blue cloudy liquid	<58
6	Tan clear liquid with solids at bottom	<58
7	Purple cloudy liquid	<56
8	Creamy tan liquid	<56
9	Greenish-gray creamy liquid	<56
10	Varnish (tan)-colored clear liquid	68
**A "<" symbol prior to the flash point indicates that the sample flashed violently at the ambient temperature. The actual flash point is much lower than the ambient temperature listed. The Flash Point temperatures have been corrected for barometric pressure per ASTM D-93 section 13.		

ATTACHMENT D

UNIFORM HAZARDOUS WASTE MANIFESTS

Emergency Contact Telephone Number

Please print or type
Form designed for use on site (12 pitch typewriter)

Form Approved OMB No. 1024-0047

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TO BE RECEIVED 5.0028	Manifest Document No. 5.0028	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address US EPA REGION 10 1200 6TH AVE, ECL-116 SEATTLE WA 98101				A. State Manifest Document Number		
4. Generator's Phone (206) 553-1263				B. State Generator's ID		
5. Transporter 1 Company Name FOSS ENVIRONMENTAL		6. US EPA ID Number WAH.000004549		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (206) 768-1434		
9. Designated Facility Name and Site Address PHILIP ENVIRONMENTAL 77TH AVENUE SOUTH KENT, WA 98032		10. US EPA ID Number WAD991281767		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (253) 872-7859		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers	13. Total Quantity	14. Unit Wt/Vol
				No.	Type	I. Waste No.
a.	WASTE FLAMMABLE LIQUIDS, N.O.S., 3, UN1993, PG II			002 DM	01600	P D001 F003 F005
b.	WASTE FLAMMABLE LIQUIDS, N.O.S., 3, UN1993, PG II			010 DM	2200	P D001 F003 F005
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11a) D001, F003, PROFILE # 40430-03-00 11b) D001, F003, F005, PROFILE # 40430-14-00, LABPACK				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Michael Szorling				Signature <i>Michael Szorling</i>		Month Day Year 09/10/99
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MARK ALLEN GREGORY				Signature <i>Mark Allen Gregory</i>		Month Day Year 10/10/99
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name				Signature		Month Day Year

GENERATOR

TRANSPORTER

FACILITY

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

T.O. BE RECEIVED

Manifest
Document No.

50028

2. Page 1

of 1

Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

US EPA REGION 10
1200 6TH AVE, ECL-116
SEATTLE WA 98101

4. Generator's Phone

(206) 553-1263

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name

FOSS ENVIRONMENTAL

6. US EPA ID Number

WAH.000.004.549

C. State Transporter's ID

D. Transporter's Phone (206) 768-1434

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

PHILIP ENVIRONMENTAL
77TH AVENUE SOUTH
KENT, WA 98032

10. US EPA ID Number

WA.D.9.9.1.281.7.6.7

G. State Facility's ID

H. Facility's Phone

(253) 872-7859

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

12. Containers

No.

Type

13.
Total
Quantity14.
Unit
Wt/Vol1.
Waste No.a. WASTE FLAMMABLE LIQUIDS, N.O.S., 3,
UN1993, PG II

002 DM 1600 P

D001
F003
F005b. WASTE FLAMMABLE LIQUIDS, N.O.S., 3,
UN1993, PG II005 1100
010 DM 2200 PD001
F003
F005c. WASTE FLAMMABLE LIQUIDS, N.O.S.,
UN1993, PG II

001 CW 20.0 P

D001
F003
F005

d.

J. Additional Descriptions for Materials Listed Above

11a) D001, F003, PROFILE # 40430-14-00

11b) D001, F003 F005, PROFILE # 40430-14-00, LABPACK

11c) PROFILE # 40430-14-00 LABPACK

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

ORDER 16040

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Printed/Typed Name

Michael Szerlog

Signature

Michael J Szerlog

Month Day Year

10 9 1999

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

MARK ALLEN GREGORY

Signature

Mark Allen Gregory

Month Day Year

10 9 1999

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

10 9 1999

19. Discrepancy Indication Space

11b.c: SEC 12 - CONTAINER NUMBERS REFLECT OUTER
PACKAGING. - CONTENTS: 11b - 32 DM, 11c - 24 DM. MANIFEST AMENDED
PER MARK FOSTER, ON BEHALF OF GENERATOR Rob Foster 9/14/99

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Michael C. Austin

Signature

Michael C. Austin

Month Day Year

9 11 1999